

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Florida

United States of America
v.
Luis Aurelio Vargas Del Toro,

Case No. 24-6334-mj-JMS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 17, 2024 in the county of Broward in the
Southern District of Florida, the defendant(s) violated:

Code Section
Title 21, United States Code,
Sections 841(a)(1) and 846

Offense Description
On or about July 17, 2024, Luis Aurelio Vargas Del Toro did conspire and
possess with the intent to distribute 500 grams or more of a mixture and
substance containing a detectable amount of cocaine.

FILED BY AT D.C.

Jul 17, 2024

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTL

This criminal complaint is based on these facts:
SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.



Complainant's signature

Forrest Maness, DEA Special Agent

Printed name and title

Sworn to and subscribed before me by FaceTime in accordance with Fed.R.Crim.P. 41.1.

Date: July 17, 2024



Judge's signature

City and state: Fort Lauderdale, Florida

Jared M. Strauss, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

Your affiant, Forrest Maness, being duly sworn, deposes and states as follows:

INTRODUCTION

1. I am a Special Agent with the Drug Enforcement Administration ("DEA") and have served in this capacity since November 2023. I am currently assigned to the DEA Miami Field Division Enforcement Group 10, where I have been involved in investigations involving narcotics trafficking and money laundering. As a SA with DEA, I have participated in the execution of numerous search and seizure warrants, resulting in the seizure of illegal controlled substances, packaging materials, firearms, and other tools of the drug trade. I also participated in debriefings of narcotics traffickers, cooperating individuals, and sources of information. Through these debriefings, I have become familiar with the terminology, code words, and brand names used by drug dealers. In addition, I have testified before grand juries, resulting in federal indictments. I also have experience assisting in investigations that involved money laundering, and international drug trafficking and conspiracy.

2. As a law enforcement officer within the meaning of Title 18, United States Code, Section 2510(7), I am empowered by law to conduct investigations of and make arrests for, but not limited to, offenses enumerated in Titles 18, 21, and 46 of the United States Code.

3. I make this Affidavit in support of a criminal complaint charging Luis Aurelio VARGAS DEL TORO with possession with intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine and conspiracy to do so, in violation of Title 21, United States Code, Sections 841 and 846.

4. I submit this Affidavit based on my personal knowledge, as well as information provided to me by other individuals, including other law enforcement officials, and my review of

records and other evidence obtained during the course of this investigation. Because this Affidavit is being submitted for the limited purpose of establishing probable cause for the requested warrant, it does not include every fact known to me about this matter.

PROBABLE CAUSE

5. In or around October 2023, DEA Enforcement Group 10 (EG-10) received information in relation to a drug trafficking organization distributing and transporting multi-kilogram level quantities of various narcotics from Mexico into the United States of America (USA). Subsequently, Law Enforcement received a telephone number utilized by the organization, (52-6731331385), that would be utilized to coordinate a future drug transaction.

6. On or about June 1, 2024, an undercover agent (UCA) initiated a Whatsapp messenger conversation with a Spanish speaking male who stated that they were looking to establishment a distribution network in the South Florida area.

7. On or about July 5, 2024, the UCA received information from the unidentified Spanish Speaking male stating that he had a courier transporting 18 kilograms of Cocaine to Florida and that he would provide them to the UCA for a price of \$16,000 USC per kilo. During their conversations, both parties agreed to meet on July 16, 2024, in the City of Davie, County of Broward, State of Florida, to conduct a narcotics transaction. The unidentified Spanish speaking male was also provided a telephone number, by the UCA, for a DEA Confidential Source (CS).

8. On or about July 16, 2024, the DEA CS was contacted by telephone number (662) 352-1875. A different Spanish speaking male, suspected to be the coordinator, informed the UCA and CS that the narcotics transaction would not be able to occur on the 16th as the courier was in Orlando. The coordinator further stated that the courier is in a tractor trailer and that he would be

in the Broward County area the following day (July 17, 2024). Furthermore, the coordinator informed both the CS and UCA that the transaction should take place at a truck stop located at 4690 US Highway 27, Weston, FL. 33332, because the courier is driving a large truck. The UCA informed the coordinator that the transaction will happen at 10:30 a.m.

9. On or about July 17, 2024 VARGAS DEL TORO met a DEA CS at the gas station located at 4690 US Highway 27, Weston, FL. VARGAS DEL TORO took the CS to a blue tractor trailer, bearing California tag ZP29344A, where VARGAS DEL TORO retrieved a black duffle bag from the sleeping compartment of the truck. As the CS and VARGAS DEL TORO walked with the bag back to the gas station law enforcement moved in and detained VARGAS DEL TORO. The bag contained 18 shrink-wrapped kilograms of suspected cocaine. A field test was conducted on one of the kilogram quantity packages which was positive for the presence of cocaine.

10. VARGAS DEL TORO was advised of his Miranda rights and verbally acknowledged understanding them and subsequently signed the DEA form 13 b, advice of rights (Spanish). VARGAS DEL TORO stated that approximately 1 month ago he had a sophisticated hidden compartment put into his truck and then last week took a contract, for \$9,000 USC to deliver narcotics to Florida. VARGAS DEL TORO further stated that on Wednesday July 10, 2024, he picked up the black bag, which he stated contained 18 blocks of an illegal substance, although he admitted that he didn't know if it was cocaine or another drug. VARGAS DEL TORO stated that he took possession of the narcotics in Chino, California, and drove to Orlando, FL to deliver a legitimate cargo. VARGAS DEL TORO further stated that he arrived in Orlando on July 15, 2024 and was informed on July 16 to drive to the truck stop in Weston FL. VARGAS DEL

TORO stated that he was told to meet someone at the gas station who he would then hand the narcotics over to, and in turn the person who would take possession of the narcotics would give VARGAS DEL TORO the \$9,000 USC.

CONCLUSION

11. Based upon the information provided above, there is probable cause to believe that Luis Aurelio VARGAS DEL TORO has committed violations Title 21, United States Code, Sections 841 and 846.

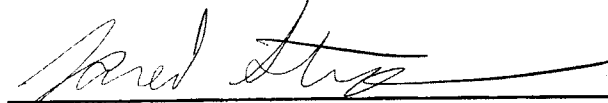
FURTHER YOUR AFFIANT SAYETH NAUGHT.

Respectfully submitted,



Forrest L. Maness, Special Agent
Drug Enforcement Administration

Sworn to and subscribed before me telephonically
on 17th day of July 2024.



JARED M. STRAUSS
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NUMBER: 24-6334-mj-JMS

BOND RECOMMENDATION

DEFENDANT: LUIS AURELIO VARGAS DEL TORO

Pre-Trial Detention

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: /s/ Paul Schwartz
AUSA: Paul Schwartz

Last Known Address: _____

What Facility: _____

Agent(s):

Forrest Maness (DEA)

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)